

SHER TREMONTE LLP

November 7, 2024

**BY ECF**

The Honorable Kiyo A. Matsumoto  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:    *United States v. An, et al., 22 Cr. 460 (KAM)***

Dear Judge Matsumoto:

We write on behalf of our client, Guanyang An, to respectfully request a temporary modification of her bond to permit her to travel with her family, including her two young children, for a vacation to Los Angeles, California from December 21, 2024 through January 5, 2025, to visit Disneyland, Hollywood Studios, and other attractions.

Ms. An was arrested on October 20, 2022 in connection with the above-captioned indictment, and she was released on bail conditions the following day. On May 28, 2024, Ms. An pled guilty to one count of 18 U.S.C. § 371. Under the terms of her bond, Ms. An's travel is restricted to New York City and Long Island, New York. Ms. An has abided by all conditions of her pretrial release.

We have conferred with the government and Pretrial Services regarding Ms. An's proposed travel. The government and Pretrial Services have advised that they have no objection to the request. Accordingly, we respectfully request that the Court temporarily modify the terms of Ms. An's bond to allow her to travel to Los Angeles, California from December 21, 2024 through January 5, 2025.

Respectfully submitted,

/s/ Justine A. Harris  
Justine A. Harris  
Alison Moe  
Katie Renzler  
*Attorneys for Guanyang An*

cc:    All parties (by ECF)